

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION

UNITED STATES OF AMERICA	)	
<i>ex rel.</i> Christine Ribik,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	Civil Action No. 1:09 cv 13-CMH-TCB
	)	(Lead Case)
	)	
HCR MANOR CARE INC. et al.,	)	
	)	
Defendants	)	
	)	
	)	

**MOTION TO COMPEL DISCOVERY AND FOR SANCTIONS**

COMES NOW Christine Ribik, by counsel, and files this her Motion to Compel Discovery and for Sanctions and incorporates by reference her Memorandum in Support of her Motion to Compel and for Sanctions filed herewith and pursuant to Rule 30 of the Federal Rules of Civil Procedure and other applicable authority as cited, hereby respectfully moves this Court to compel the reconvening of the deposition of Chief Operating Officer Stephen Guillard at the plaintiff's counsel's office at the defendants' expense; that the deposition will be conducted by counsel for Relator Christine Ribik for a period of not to exceed three (3) hours; the witness to be instructed not to engage in additional preparation including reviewing of his unfinished deposition testimony, or discussing his testimony within any other third party; requiring defendants' counsel not to direct or request that witness not answer a question unless the counsel has objected to the question on the grounds that the answer is protected by a privilege or limitation of evidence directed by the Court; limiting defendants counsel from making objections

or statements which might suggest answers to a witness; to instruct counsel to make objections pursuant to the applicable Rules of Court; permitting relator's counsel to participate in future depositions, over the seven (7) hour allocated for a period not less than one (1) hour; and any additional relief this Court finds just and proper, and any additional relief this Court finds just and appropriate including limiting Mr. Dubelier's participation in future depositions.

Respectfully Submitted,

/s/ Jeffrey J. Downey

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**CERTIFICATE OF SERVICE**

I HEREBY AFFIRM that a true and correct copy of the foregoing Motion was sent to the below referenced parties and/or their counsel and on all counsel of record by using the CM/ECF system, which generated a Notice of Electronic filing, on this 17th day of May, 2017:

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